

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

KPM ANALYTICS NORTH AMERICA
CORPORATION,

Plaintiff.

v.

Civil Action No. 21-10572-MRG

BLUE SUN SCIENTIFIC, LLC, THE
INNOVATIVE TECHNOLOGIES GROUP &
CO., LTD., ARNOLD EILERT, MICHELLE
GAJEWSKI, ROBERT GAJEWSKI,
RACHAEL GLENISTER, GREGORY
ISRAELSON, IRVIN LUCAS, AND PHILIP
OSSOWSKI,

Defendants.

**PLAINTIFF KPM ANALYTICS NORTH AMERICA CORPORATION'S
PROPOSED FINAL JUDGMENT FILING**

Plaintiff KPM Analytics' North America Corporation ("KPM" or "Plaintiff") submits this Proposed Final Judgment Filing in accordance with the Court's October 1, 2024, Order at ECF No. 311. Pursuant to the Court's Order, KPM hereby submits as **Exhibit 1** hereto a Proposed Final Judgment and Permanent Injunction and corresponding Exhibit to the Proposed Final Judgment and Permanent Injunction listing the 50 KPM customers that Plaintiff requests be specifically named in the final permanent injunction order. In accordance with the Parties' and the Court's prior practice, Plaintiff requests that the attached Exhibit to the Proposed Final

Judgment and Permanent Injunction be filed and kept under seal and may only be viewed by the parties and any other party that is bound by the permanent injunction. Accordingly, the Exhibit (and its annotated counterpart discussed below) is being provided via email to the Clerk (and not on the public docket) in MS Word format as part of the materials requested by the Clerk.

In addition, and pursuant to the Court's Order at ECF No. 311, Plaintiff hereby also submits as **Exhibit 2** an annotated version of the Plaintiff's Proposed Final Judgment and Permanent Injunction that includes record citations in support of entering Plaintiff's Proposed Final Judgment and Permanent Injunction, as well as an annotated version of the proposed Exhibit to the Proposed Final Judgment and Permanent Injunction containing the trial record citations supporting the inclusion of these 50 KPM customers in the final permanent injunction order. This version is intended to assist the Court in evaluating the Plaintiff's submission, but Plaintiff does not intend for these citations to be included in the order entering final judgment.

Date: October 4, 2024

Respectfully submitted,

KPM Analytics North America Corporation,

By its attorneys,

/s/ Paige K. Zacharakis

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CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of October 2024, a true and correct copy of the foregoing document was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Paige K. Zacharakis

Paige K. Zacharakis